

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

VINCENT BROCOLI,
a/k/a Vince,
a/k/a Matthew Dehart,
a/k/a BunchMedia,
a/k/a BunchMarketing,

Defendant.

CASE NO.
JUDGE

2:19-cr-194
Judge Marbley

INDICTMENT

18 U.S.C. § 2261A(2)

UNDER SEAL

FILED
CLERK OF COURT
RICHARD W. NAGEL
2019 AUG 29 PM 3:29
U.S. DISTRICT COURT
SOUTHERN DIST. OHIO
EAST DIV. COLUMBUS

THE GRAND JURY CHARGES:

COUNT 1

(18 U.S.C. § 2261A(2): Cyberstalking)

1. From in or about August 2016, until in or about April 2019, within the Southern District of Ohio and elsewhere, the defendant, **VINCENT BROCOLI**, with the intent to harass and intimidate, used an interactive computer service, electronic communication service, electronic communication system of interstate commerce, and other facilities of interstate and foreign commerce, namely, the internet, to engage in a course of conduct, described below, that placed victim K.K. in reasonable fear of death or serious bodily injury, and caused, attempted to cause, and would reasonably be expected to cause, substantial emotional distress to K.K., an immediate family member of K.K., and a spouse or intimate partner of K.K.

Course of Conduct

2. Defendant **VINCENT BROCOLI**'s course of conduct included, among other things,

the following:

a. On or about March 11, 2016, the defendant, **VINCENT BROCOLI**, created the Instagram account @willfan84, which he later changed to @xokirstylies1, in reference to victim K.K.

b. On or about July 22, 2016, the defendant, **VINCENT BROCOLI**, created the Instagram account @truth2bot, which he later changed to @xokirstyslut1, in reference to victim K.K.

c. On or about July 30, 2017, the defendant, **VINCENT BROCOLI**, created the Instagram account @killyourselfkirsty, in reference to victim K.K.

d. On or about August 18, 2017, the defendant, **VINCENT BROCOLI**, created the Instagram account @ihatekirstenkeesee122, in reference to victim K.K.

e. On or about June 30, 2018, the defendant, **VINCENT BROCOLI**, created the Instagram account @elijahgaypride1055, in reference to victim K.K.'s spouse and intimate partner.

f. On or about August 29, 2018, the defendant, **VINCENT BROCOLI**, created the account @kirstenjoyslutsee8890, in reference to victim K.K.

g. On or about May 1, 2017, the defendant, **VINCENT BROCOLI**, used the Internet to post the following comment to @XOKirstySky on Twitter: "All you had to do was be honest. I asked for little. You refuse to apologize. It's your reputation. I assure you it won't be going away."

h. On or about June 20, 2017, the defendant, **VINCENT BROCOLI**, used the Internet to post the following comment on Instagram: "Kirsten Joy Keesee gave a BJ to Kyle Higgins and swallowed all his semen."

i. On or about July 26, 2017, the defendant, **VINCENT BROCOLI**, used the Internet to post the following comment on Instagram: “Kirsten Joy Keesee is a WHORE.”

j. On or about July 26, 2017, the defendant, **VINCENT BROCOLI**, used the Internet to direct share the following comment on Instagram: “Kirsten Keesee is a manipulative lying slut!”

k. On or about July 26, 2017, the defendant, **VINCENT BROCOLI**, used the Internet to direct message @kirstenkeesee on Instagram, stating:

Look at the little baby. The little whore thinks she safe and secure hiding behind her private account putting on the Christian act now. Chained to mommy and daddys leg sucking off their tit without a real job. You’re a pathetic phony. Fuck you. ps. I follow you. Guess who?

l. On or about July 26, 2017, the defendant, **VINCENT BROCOLI**, used the Internet to post a photo of victim K.K. with a cross on her forehead for the Instagram account @kirstyslut1.

m. On or about July 27, 2017, the defendant, **VINCENT BROCOLI**, used the Internet to post a photo of victim K.K. with a cross on her forehead for the Instagram account @xokirstylies1.

n. On or about July 27, 2017, the defendant, **VINCENT BROCOLI**, used the Internet to direct share the following comment to @kirstenkeesee on Instagram: “Delete your account Kirsten. They will stop. You go away we go away.”

o. On or about July 30, 2017, the defendant, **VINCENT BROCOLI**, used the Internet to post a profile photo of victim K.K. with a cross on her forehead for the Instagram account @killyyourselfkirsty.

p. On or about August 18, 2017, the defendant, **VINCENT BROCOLI**, using the account @ihatekirstenkeesee122, used the Internet to post the following comment on Instagram: “@kirstenkeesee UGLY SLLUT [sic].”

q. On or about August 18, 2017, the defendant, **VINCENT BROCOLI**, using the

account @ihatekirstenkeesee122, used the Internet to post the following comment on Instagram: “@kirstenkeesee I hope you get cancer and die UGLY SLLUT [sic].”

r. On or about August 24, 2017, the defendant, **VINCENT BROCOLI**, used the Internet to post the following comment to @DrendaKeesee and @XOKirstySky on Twitter: “Tell me about it Drenda! Never waste time with or trust a manipulative backstabbing LIAR like your daughter Kirsten Joy Keesee.”

s. On or about September 21, 2017, the defendant **VINCENT BROCOLI**, used the Internet to direct share the following comment to @kirstenkeesee on Instagram:

The only thing more worthless then your videos are your mothers worthless books. Your family are scam artist pieces of shit. You have 200 followers cause people know you are a phony. Go away and die. Just put a gun in your mouth and get it over with.

t. On or about September 10, 2017, the defendant, **VINCENT BROCOLI**, used the Internet to post the following comment to @DrendaKeesee and @XOKirstySky on Twitter: “Kirsten Joy Keesee, you’ve been subtweeting under mommy’s account long enough. YOU are being held accountable for YOUR actions, child.”

u. On or about September 12, 2017, the defendant, **VINCENT BROCOLI**, using the account @SnakeOilGary, in reference to victim K.K.’s father, used the Internet to post the following comment on Twitter: “It’s been said that my daughter Kirsten is a lying whore. I prayed and asked God about it. He agreed.”

v. On or about February 13, 2018, the defendant, **VINCENT BROCOLI**, used the Internet to post the following comment:

Do you feel hurt Kirsten? Good. Go fuck yourself. Lying plagiarist scam artist creep. You are sitting there filtering questions for your mommy aren’t you? That’s your real job. You have none. Running mommy’s social media. Big time writer. You’re a liar and a loser. For 2 years you stole my quotes and posted them on mommy’s account. Trust this, it will never be forgotten.

w. On or about March 12, 2018, the defendant, **VINCENT BROCOLI**, used the Internet to post the following comment: “Hey Drenda this is Kirsten’s boyfriend Elijah and I just wanted you to know that I came all over Kirsten’s face last night and it ran down her whore chin. She’s my little Christian WHORE.”

x. On or about April 8, 2018, the defendant, **VINCENT BROCOLI**, used the Internet to post the following comment: “Kirsten Joy Keesee is a worthless lying SLUT.”

y. On or about April 9, 2018, the defendant, **VINCENT BROCOLI**, used the Internet to post the following comment: “Kirsten Keesee took Elijah’s gay cum down her throat and now she has aids. Diseased whorebag.”

z. On or about November 9, 2018, the defendant, **VINCENT BROCOLI**, used the Internet to post the following comment on YouTube:

Figured it was only a matter of time before Kirsten Joy Slutsee needed attention. Only a matter of time before the little lying rat crawled out of her hole and wanted to be noticed again. If that’s what you want then you will get exactly what you are looking for. Many articles are sitting in draft exposing you and your family. I’ve neglected to make them public because I’ve given you a chance to redeem yourself. Nope, here we go again. If you think it all went away and you are in the clear now then you are dead wrong. Time to make them all public now I guess. You’re still the same annoying little twat. The same little creep that hides behind her parents Twitter accounts plagiarizing other words. I will edit every one of these articles now to include the updated name of McKinney so that they follow you in Google search for the rest of your life.

aa. On or about November 9, 2018, the defendant, **VINCENT BROCOLI**, using the account @DelusionalDrenda, in reference to victim K.K.’s mother, used the Internet to post the following comment on YouTube: “I’m so proud of my scam artist daughters uploading cringe garbage to the internet. I see Elijah. He looks like he has aids.”

bb. In or about January 2019, the defendant, **VINCENT BROCOLI**, using the account BunchMediaAGAIN, used the Internet to post the following comment on YouTube: “You just

couldn't listen last time could you scumbag? GO AWAY. What about that do you not understand? I will message any person that comments here and tell them personally how much of a liar and fraud you and your family are. FU and your homo husband." The account utilized, BunchMediaAGAIN, had a profile photo of what appears to be a broccoli stalk stating, "I'M BACK!"

All in violation of 18 U.S.C. § 2261A(2).

COUNT 2
(18 U.S.C. § 2261A(2): Cyberstalking)

3. From in or about August 2016, until in or about April 2019, within the Southern District of Ohio and elsewhere, the defendant, **VINCENT BROCOLI**, with the intent to harass and intimidate, used an interactive computer service, electronic communication service, electronic communication system of interstate commerce, and other facilities of interstate and foreign commerce, namely, the internet, to engage in a course of conduct, described below, that placed victim D.K. in reasonable fear of death or serious bodily injury, and caused, attempted to cause, and would reasonably be expected to cause, substantial emotional distress to D.K., an immediate family member of D.K., and a spouse or intimate partner of D.K.

Course of Conduct

4. Defendant **VINCENT BROCOLI**'s course of conduct included, among other things, the following:

- a. On or about July 26, 2017, the defendant, **VINCENT BROCOLI**, created the Instagram account @brainwashedbydrenda, in reference to victim D.K.
- b. On or about February 21, 2018, the defendant, **VINCENT BROCOLI**, created the Twitter account @DeludedDrenda, in reference to victim D.K.

c. On or about June 22, 2017, the defendant, **VINCENT BROCOLI**, using the account @xokirstylies1, referencing victim D.K.'s daughter, K.K., used the Internet to post the following comment to @DrendaKeesee on Instagram:

She's a nut job. You're a nut job. Souless [sic] empty eyes. The world is going to be a much better and more sane place when you kooks finally croak and stay away from screwing up politics for the rest of us. Bachmann tries to pray the gay away. Good luck with that!

d. On or about June 24, 2017, the defendant, **VINCENT BROCOLI**, used the Internet to post the following comment to @DrendaKeesee on Instagram:

Bug eyed psychopaths. Why did you have to go black and white Drenda? To hide the wrinkles on your phony melting wax figure face? Your daughter is a slllutt who swallowed Kyles semen and she will look like a wax figure just like you in 10 years.

e. On or about July 14, 2017, the defendant, **VINCENT BROCOLI**, using the account @xokirstylies1, referencing victim D.K.'s daughter, K.K., used the Internet to post the following comment to @DrendaKeesee on Instagram:

We're coming Drenda. Rip off reports, videos, articles. Your entire family EXPOSED for the scamming lowlife pieces of human garbage you are. I suggest you and snake oil Gary stop scamming people and get a real job... or face the music. It's coming. JOHN 2:16.

f. On or about August 22, 2017, the defendant, **VINCENT BROCOLI**, using the account, @SnakeOilGary, in reference to victim D.K.'s husband, G.K., posted the following comment to @DrendaKeesee on Twitter: "We raised Kirsten good didn't we honey? She tells our lies. Spreads our propaganda. Our mindless SLAVE!"

g. On or about August 24, 2017, the defendant, **VINCENT BROCOLI**, used the Internet to post the following comment to @DrendaKeesee and @XOKirstySky on Twitter: "Tell me about it Drenda! Never waste time with or trust a manipulative backstabbing LIAR like your daughter Kirsten Joy Keesee."

h. On or about July 25, 2017, the defendant, **VINCENT BROCOLI**, using the account @xokirstyslut1, referencing victim D.K.'s daughter, K.K., used the Internet to post the following comment to @DrendaKeesee on Instagram:

Your daughter Kirsten Joy Keesee is a manipulative lying SLUUT and I heard it will be really LOUD when they show up in person at Love Encounter and tell her in person. Might even shout it for everyone to hear!

i. On or about January 10, 2018, the defendant, **VINCENT BROCOLI**, used the Internet to post the following comment to @DrendaKeesee on Twitter: "@DrendaKeesee Shut up and die."

j. On or about March 18, 2018, the defendant, **VINCENT BROCOLI**, used the Internet to post the following comment to @DrendaKeesee on Twitter: "Really sick and disturbing. Adults preying on and brainwashing children need to be arrested for child abuse. #KeeseeFamilyCult #FaithLifeChurchCult #Pedophiles."

All in violation of 18 U.S.C. § 2261A(2).

COUNT 3
(18 U.S.C. § 2261A(2): Cyberstalking)

5. From in or about August 2016, until in or about April 2019, within the Southern District of Ohio and elsewhere, the defendant, **VINCENT BROCOLI**, with the intent to harass and intimidate, used an interactive computer service, electronic communication service, electronic communication system of interstate commerce, and other facilities of interstate and foreign commerce, namely, the internet, to engage in a course of conduct, described below, that placed victim G.K. in reasonable fear of death or serious bodily injury, and caused, attempted to cause, and would reasonably be expected to cause, substantial emotional distress to G.K., an immediate family member of G.K., and a spouse or intimate partner of G.K.

Course of Conduct

6. Defendant **VINCENT BROCOLI**'s course of conduct included, among other things, the following:

a. On or about January 9, 2014, the defendant, **VINCENT BROCOLI**, created the Twitter account @NiggerShack, which he later changed to @SnakeOilGary on or about August 7, 2017, in reference to victim G.K.

b. On or about November 5, 2017, the defendant, **VINCENT BROCOLI**, used the Internet to post the following comment to @GaryKeesee on Twitter: "No Gary, we just want to prevent you from scamming people. The enemy is you scumbag and there isn't going to be any backing off."

c. On or about December 15, 2017, the defendant, **VINCENT BROCOLI**, using the account @killyyourselfkirsty, in reference to victim G.K.'s daughter, K.K., used the Internet to post the following comment to @GaryKeesee on Instagram: "SCAM ARTIST."

d. On or about December 15, 2017, the defendant, **VINCENT BROCOLI**, using the account @killyyourselfkirsty, in reference to victim G.K.'s daughter, K.K., used the Internet to post the following comment on Instagram: "GARY KEESEE IS A SCAMMER STOP TURNING GODS HOUSE INTO A MARKETPLACE READ JOHN 2:16."

e. On or about March 16, 2018, the defendant, **VINCENT BROCOLI**, used the Internet to post the following comment to @SnakeOilGary and @GaryKeesee on Twitter: "Gary's a charlatan. A scam artist. He associates with scumbags because he is one. Good to see that you have seen through Snake Oil Gary's lies!"

f. On or about August 30, 2018, the defendant, **VINCENT BROCOLI**, using the account @elijahgaypride1055, in reference to victim G.K.'s daughter, K.K.'s spouse and intimate

husband, used the Internet to post the following comment to @GaryKeesee on Instagram:

The prosperity gospel is unbiblical. Read Matthew 21:12 and John 2:16. Jesus hated sales in the church. You're a con artist piece of shit manipulating people for profit in the name of God. You boldly tell people to "forget religion" because you don't actually follow the Bible asshole. You will be the first to go to hell and answer to the real God when the time comes.

g. On or about March 20, 2019, the defendant, **VINCENT BROCOLI**, using the account @BunchMedia3rd, used the Internet to post the following comment on Twitter: "Gary Keesee is a scam artist manipulating you." The Twitter account utilized, @BunchMedia3rd, had a profile photo of a red label reading, "FINAL WARNING."

All in violation of 18 U.S.C. § 2261A(2).

A TRUE BILL.

S/Foreperson

FOREPERSON

BENJAMIN C. GLASSMAN
UNITED STATES ATTORNEY



JESSICA H. KIM (0087831)
Assistant United States Attorney



CHRISTOPHER N. ST. PIERRE (0097673)
Special Assistant United States Attorney